

Exhibit A

David Rothstein

From: David Rothstein <drothstein@rothsteinlawfirm.com>
Sent: Wednesday, December 17, 2014 4:14 PM
To: 'Kathryn Thomas'
Cc: 'Fred Williams'; kathy.helms@ogletreedeakins.com
Subject: RE: Irani v. Palmetto Health et al.

Kathryn. As long as I can get complete responses to my discovery from USC and Palmetto Health, I am fine with holding off on the individual discovery of Koon and Walsh until after the qualified immunity issue is addressed by the Court. Koon and Walsh will still be material witnesses, regardless of whether they continue as individual parties, so I will need to take their depositions irregardless of whether they have qualified immunity from personal liability.

Can I contact Judge West's law clerk to see if she requires a formal consent motion for the agreed-upon extension, or if a letter request confirming the extension is sufficient? Thanks, Dave.

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From: Kathryn Thomas [<mailto:kthomas@gsblaw.net>]
Sent: Monday, December 15, 2014 5:14 PM
To: David Rothstein
Cc: Fred Williams
Subject: Re: Irani v. Palmetto Health et al.

David --

Not a problem. We will need an extension of time from you on our discovery responses, and to ask if you will agree to our not responding on behalf of Drs. Koon and Walsh until the qualified immunity issue is resolved. Thank you for your consideration.

On Dec 15, 2014, at 4:45 PM, David Rothstein <drothstein@rothsteinlawfirm.com> wrote:

Dear Kathryn. I hope you are well. I spoke with Fred Williams in your office earlier today, but he deferred to you on this. I am writing to request a 20-day extension to respond to your motion for partial judgment on the pleadings. My brief is currently due next Monday, Dec. 22. I will be out of town most of next week. I am going on an anniversary trip with my wife Saturday through Tuesday, and then we will be closed for the rest of the week for Christmas. Thank you in advance for your accommodating me on this. Dave.

David E. Rothstein
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